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Attorneys for United States of America

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

NEGASI ISHAIAH ZUBERI aka JUSTIN JOSHUA HYCHE,

Defendant.

The United States of America hereby files the following Bill of Particulars for Forfeiture of Property.

The United States gives notice that in the forfeiture allegation of the Superseding

Indictment, the United States is seeking forfeiture of the following property:

- 1. Three AR-15 magazines (5.56) containing ammunition;
- 2. One antenna device
- 3. One antenna device
- 4. 5.56 and 12 GA ammunition in plastic green ammunition box.
- 5. Nineteen rounds of assorted 9mm pistol ammunition
- 6. Double lock nickel plated steel handcuffs in box
- 7. Green metal ammunition can with Handcuff keys, lapel pin, 5.56 ammunition
- 8. Springfield XD 9mm Pistol Case
- 9. Steel ballistic plate vest carrier with three AR-15 Magazines (5.56)

- 10. Springfield Armory steel 9mm magazine
- 11. Barrel and upper receiver for 6mm AR Style Rifle
- 12. Springfield XD M-9 9mm pistol
- 13. Shell casing "Hornaday 9mm Luger"
- 14. Apple laptop, S/N: RN7YY6022V
- 15. Bullet "RP 9mm Luger"
- 16. Handcuff Key
- 17. One AlumaTrans Metal Gun Case
- 18. AR-15 Magazine
- 19. Three 9mm handgun magazines
- 20. Various handgun holsters
- 21. 1 set silver, 1 set black hand cuffs
- 22. Black mesh bag, cell phone jammer, unknown antenna device, black gloves, black hat, and handcuffs
- 23. Two taser cartridges
- 24. Taser "Pulse," yellow and black in color
- 25. Twenty-seven rounds 5.56 Rifle ammunition (removed from magazine)
- 26. Two rounds 12 GA 2 3/4 in 00 Buckshot rounds (located in Stoeger)
- 27. Sixty-three rounds of 9mm Ammo
- 28. Remington Model 783 .308 Cal
- 29. Anderson Manufacturing AR-15
- 30. Stoeger Condor 12 GA Shotgun
- 31. Grey iPhone with cracks on back of phone
- 32. AR-15 lower jig instructions with handwritten notes
- 33. Lower receiver with attempted milled at trigger hole
- 34. Eight rounds of 9mm Blazer ammunition
- 35. Three boxes of 7.62 Wolf ammunition

Dated: October 7, 2024. Respectfully submitted,

NATALIE K. WIGHT United States Attorney

s/ Marco A. Boccato

MARCO A. BOCCATO

Assistant United States Attorney